

KATZMELINGER
370 LEXINGTON AVENUE, SUITE 1512
NEW YORK, NEW YORK 10017
www.katzmelinger.com

Adam Sackowitz
Katz Melinger PLLC

t: 212.460.0047
f : 212.428.6811
ajsackowitz@katzmelinger.com

June 17, 2022

Via ECF

Honorable Vernon S. Broderick
United States District Court
40 Foley Square, Room 518
New York, New York 10007

Re: *Cortes et al. v. DS Brooklyn Portfolio Owner LLC et al.*
Civil Action No. 20-cv-09619


Your Honor:

We represent the plaintiffs, Joaquin Cortes and Raul Mera (“Plaintiffs”), in the above-captioned matter, and submit this letter jointly with counsel for all defendants to respectfully request a brief extension of the parties’ deadline to submit a settlement agreement and letter motion seeking approval of the settlement agreement until June 22, 2022. This is the parties’ second request for an extension of the aforementioned deadline.


Counsel have continued to work in good faith to finalize the terms of the parties’ agreement. As part of those efforts, within the last twenty-four hours, certain terms were proposed to be added to or modified within the proposed settlement agreement. Following additional discussions today, counsel now believe that they have an agreement on all terms and respectfully request a brief extension of time, until June 22, 2022, to submit a formal written settlement agreement and accompanying letter motion seeking approval of the agreement to the Court.

We apologize again for the untimeliness of this request. Counsel genuinely believed that the parties would be able to submit an agreement to the Court by today’s deadline, but unanticipated issues arose which necessitated this request for additional time.

We thank the Court for its consideration.

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 06/21/22

Respectfully submitted,


Adam Sackowitz

The parties shall have until June 24, 2022, to file their settlement agreement and letter motion. Prior to submitting, the parties should review recent case law in this District regarding the propriety of settlement approvals in similar actions, including my own recent orders. See, e.g., *Adams v. By Design LLC*, 21-CV-6157 (VSB), 2022 WL 1910135 (S.D.N.Y. June 3, 2022); *Miranda v. Grace Farms, Inc.*, 16-CV-1369 (VSB), 2022 WL 1771720 (S.D.N.Y. May 31, 2022).